

From: [Broyles, Ragan](#)
To: [McQuiddy, David](#)
Subject: FW: West RMP/Command Structure
Date: Thursday, April 18, 2013 10:32:57 AM

From: Broyles, Ragan
Sent: Thursday, April 18, 2013 9:57 AM
To: Curry, Ron; Gray, David
Cc: Coleman, Sam; Broyles, Ragan; Webster, Susan; Phillips, Pam
Subject: FW: West RMP/Command Structure

This is Sam Coleman from Ragan's PC.

More directly -

The State Police is acting as the IC and has the lead on the response. EPA is working with TCEQ under Operations.

There were NO inspections planned this year based on our current plan. However, that is currently under reconsideration.

You have information from Tito that covers a little more detail. I am including that below

- WCS: EPA establishes the guidelines and parameters for the WCS and the facility conducts the analysis. As said before, although anhydrous ammonia can explode if you have it in a confined space at the right conditions, the impact is not as great as a toxic exposure. This is why the RMP does the ammonia WCS, not an exploding fertilizer. That's why we think pelletized or powdered fertilizer - maybe ammonium nitrate - exploded, not anhydrous ammonia. There's no "approval" of an RMP - it is submitted to EPA and others for review. We can question the validity of their analysis if we find they did it wrong.

- The facility failed to file an updated RMP in 2004 but did so in 2006; R6 did an inspection and cited them for this failure. That's the only issue raised.

- The vapor cloud WCS would likely address the nursing home and other possible receptors downwind. The WCS shows a 1.5 mile zone for a total release of 53,000 # of ammonia.

- Anhydrous ammonia is commonly used in the farming sector and there are probably other sources of nitrogen for farmers to use other than the liquid/vapor.

- The Tysons issue is ammonia refrigeration to keep the chickens cold, not for fertilization. There may be other refrigerants besides ammonia (propane, chlorofluorocarbons) but ammonia is commonly used.

- Ammonium nitrate (AN) is different from anhydrous ammonia (NH₄). AN fertilizer pellets can be made to explode (ie. Oklahoma City) while it is rather difficult to make liquified anhydrous ammonia (normally a gas at ambient conditions) explode.

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From: Webster, Susan
Sent: Thursday, April 18, 2013 9:44 AM
To: Coleman, Sam; Edlund, Carl; Broyles, Ragan; Curry, Ron; Gray, David; Phillips, Pam
Subject: West RMP/Command Structure

Below is the email from Ruhl/Smith on the RMP.

R6 Command Structure:

RIC - Susan Webster

REOC - David (Wes) McQuiddy, Chris Ruhl

FOSC/Field IC: Mark Hayes; Deputys: Althea Foster, Paige Delgado, Gary Moore

Field Command Structure:

IC - Department of Public Safety (DPS)

Operations - TCEQ Haz Waste Ops Chief, EPA, CST

ASPECT flew at 0030 CST on 4/18 and will fly again on April 18 after the thunderstorms have passed the City of West.

From: Ruhl, Christopher

Sent: Thursday, April 18, 2013 9:26:05 AM

To: Webster, Susan

Subject:

RMP status - CURRENT (last update 2011 next update due 2016

Facility selected correct program level selected correct program level.

Last EPA inspection was done in 2006. Violations were found and penalty was issued. A Superfund inspector conducted inspection under CAA 112(r) authority.